

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MARIANELA MENA,

Plaintiff,

v.

**AON RISK SERVICES SOUTHWEST
INC., AON SERVICE CORPORATION,
AON PLC, AND BRUCE JEFFERIS,**

Defendants.

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Civil Action No.: 4:19-cv-02595

JURY TRIAL DEMANDED

PLAINTIFF'S INITIAL DISCLOSURES UNDER FED. R. CIV. P. RULE 26(a)

COMES NOW, Marianela Mena, Plaintiff herein, and pursuant to Fed. R. Civ. P. 26 files her Initial Disclosures as follows:

A. The individuals currently believed to have potentially discoverable information relevant to disputed facts in this litigation:

See Exhibit "A" attached hereto.

B. Documents in Plaintiff's possession which are, or may be, relevant to disputed facts in this action:

1. Correspondence, emails, and recorded conversations relating to her employment with and termination by Defendants.
2. Policies or manuals from her employment with Defendants.
3. Fee and expense invoices from Plaintiff's attorneys.

C. Preliminary computation of Plaintiff's damages to date:

Plaintiff has past lost wages in an amount of approximately \$270,000. Plaintiff has been unable to secure new employment because of Defendants' actions, defamation, and slander, and continues to suffer future lost wages in an amount as of yet unknown. Further, Plaintiff has suffered and continues to suffer reputational and emotional damages because of Defendants' actions, defamation, and slander, and seeks damages for these injuries and punitive damages in an amount to be determined by the trier of fact. Plaintiff has been required to retain attorneys to bring her claims and Plaintiff seeks attorneys' fees and costs in an amount that continues to increase and which cannot be estimated at this time, as well as pre-judgment interest which cannot be calculated at this time.

D. Insurance policies affording coverage for judgment:

Not applicable.

Dated: December 13, 2019

Respectfully submitted,

/s/Fred Hagans

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ATTORNEYS FOR PLAINTIFF
MARIANELA MENA

CERTIFICATE OF SERVICE

The undersigned certifies that Plaintiff's Initial Disclosures under Fed. R. Civ. P. Rule 26(a) and Exhibit was filed electronically in compliance with Local Rule CV-5.1. As such, this document was served on all counsel of record who have consented to electronic service on this 13th day of December 2019.

/s/Fred Hagans

Fred Hagans